

EXHIBIT A

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Howard Shipman – March 23, 2023

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
CASE NO. 23-CV-00613 (JGK)

_____)
STONEX GROUP INC., and STONEX)
FINANCIAL,)
Plaintiff(s),)
vs.)
HOWARD SHIPMAN,)
Defendant(s).)
_____)

* CONFIDENTIAL *

DEPOSITION UNDER ORAL EXAMINATION OF
HOWARD SHIPMAN
DATE: March 23, 2023

REPORTED BY: MICHAEL FRIEDMAN, CCR

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1 She says, "Hi, Craig, I asked about
2 the allegation you brought to my attention."

3 Scroll over here.

4 So do you have any reason to
5 believe that's false, that she asked you
6 about the allegation?

7 THE WITNESS: I can answer that
8 without waiving attorney/client
9 privilege.

10 MR. CARLSON: Read it back one more
11 time.

12 Q On December 13, in an e-mail to
13 Craig Hynowitz, Ms. Peters Hamlin stated,
14 "Hi, Craig, I asked about the allegation you
15 brought to my attention that my client
16 allegedly put code into a software so that it
17 would not work unless he added a new piece of
18 code every day. The allegation is patently
19 and provenly false.

20 "It is very easy to disprove this
21 allegation through the code source control.
22 Therefore, my client is not remotely
23 concerned about that fatuous claim."

24 So given what she said in that
25 e-mail, do you have any reason to believe she

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1 didn't speak to you about this subject as of
2 December 13?

3 MR. CARLSON: And it's governed by
4 attorney/client privilege. Going to
5 maintain the privilege.

6 MR. CHINN: But I'm asking -- I'm
7 asking about, you know --

8 MR. CARLSON: That's a yes or no,
9 did he know it or did he not know it.

10 Q Do you have any reason to believe
11 that she's lying here?

12 I mean, she -- she says, "I asked
13 about the allegation. My client is not
14 remotely concerned."

15 Do you have any reason to believe
16 that she's lying, that she says she asked
17 you, obviously. That's who she's talking
18 about.

19 MR. CARLSON: You can answer that.

20 A I can answer that.

21 I did not have any reason to
22 believe she was lying in that e-mail titled
23 Settlement Purposes Only.

24 Q Look even if -- you came to
25 understand yourself, I think, and you know